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April 10, 2009

Mr. James Hahnenberg
Remedial Project Manager
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

**Re: Monthly Progress Report for April 2009, North Bronson Industrial Area Site
Operable Unit 1, Bronson, Michigan**

Dear Mr. Hahnenberg:

The North Bronson Potentially Responsible Parties Group (the Group) submits this monthly progress report to the U.S. Environmental Protection Agency (USEPA), Region 5, pursuant to Article X (Reporting Requirements), Paragraph 31 of the Consent Decree for Operable Unit 1 at the North Bronson Industrial Area (NBIA) Site. This report summarizes efforts by the Group to fulfill the requirements of the Consent Decree for Remedial Design and Remedial Action (RD/RA) at the site during April 2009.

1. Activities Completed During This Reporting Period

- A. On April 10, 2009, the Group submitted the March 2009 monthly progress report to USEPA with copies to the Michigan Department of Environmental Quality (MDEQ).
- B. On April 14, 2009, O'Brien & Gere Engineers, Inc. submitted to USEPA and MDEQ on behalf of the Group the final report for the NBIA Operable Unit 1 Vapor Intrusion Study.
- C. Also on April 17, 2009, USEPA forwarded comments from the MDEQ regarding the proposed locations of monitoring wells to complete the delineation of the extent of volatile organic compounds in groundwater to the west of the Western Lagoon Area. The Group reviewed these comments and discussed them via telephone with EPA on April 17, 2009.

- D. The Group continued to work with the City of Bronson to facilitate the enactment of the municipal groundwater ordinance and implementation of the environmental restrictive covenants for the Western Lagoon Area property.

2. Results of Sampling and Tests and Other Data

- A. The Group submitted the final report for the NBIA Operable Unit 1 Vapor Intrusion Study on April 14, 2009.

3. Work Plans, Procedures, and Deliverables

- A. The Group submitted no work plans, procedures, or deliverables during the reporting period.

4. Actions Projected for Next Six-Week Period

- A. Following USEPA approval, the Group will complete the Groundwater Delineation Study, including installation of additional wells as described in our meeting discussion of March 17, 2009 and a second round of groundwater sampling of newly installed wells.
- B. Following USEPA approval, the Group will conduct the sediment and soil sampling described in the *County Drain #30 Sediment and Soil Sampling Work Plan* submitted on February 27, 2009.
- C. The Group and City plan to submit to USEPA and MDEQ the proposed City Well Restriction Ordinance with revised/final mapping of the Restricted and Buffer Zones.
- D. In cooperation with the City, the Group will continue to pursue agreements with residents to facilitate provision of City water to residences within the restricted and buffer zones who currently use private wells.

5. Progress and Schedule Report

- A. Near-term milestones for on-going Group activities are as follows:

Groundwater Delineation Study

- Following USEPA approval, the Group will complete the Groundwater Delineation Study, including installation of additional wells as described in our meeting discussion of March 17, 2009 and a second round of

groundwater sampling of newly installed wells. The estimated timeframe for this activity, including laboratory analysis, data validation, and reporting, is eight weeks after mobilization.

County Drain #30 Sediment and Soil Sampling

- The Group will initiate the CD #30 sediment and soil sampling upon USEPA approval. The projected schedule for this activity is provided in the corresponding work plan.
- B. As discussed in our meeting of March 17, 2009, progress related to RD/RA for enhanced source control at the Eastern and Western Lagoon Areas and County Drain #30 remediation requires resolution of appropriate cleanup standards for non-erodible soils associated with County Drain #30 and GSI criteria. To that end, the Group understands that MDEQ is currently conducting the following reviews:
- Groundwater monitoring requirements and corresponding flux calculation needed to demonstrate compliance with GSI criteria consistent with the limited zone of metals in groundwater as compared to the full area of groundwater discharge to CD #30 within the NBIA site; and
 - Recent shallow groundwater data north of CD #30 to confirm that soil-to-groundwater cleanup criteria are not required for non-erodible soils along the north side of CD #30.
- C. There are currently no other unresolved issues that affect the performance or timing of pre-design or RD activities.

6. Summary of Proposed or Approved Changes to the Work Plans or Schedules

- A. Each of the work plans for the ongoing tasks described in Item 5A above include addenda to the Pre-Design Studies FSQAP. These addenda provide for additional sampling and analytical protocols associated with those efforts. These work plans also include addenda to the site Health and Safety Plan to address task-specific health and safety issues.
- B. The near-term milestones associated with the most-recent working schedule update are those identified in Item 5.A above.

7. Activities Undertaken in Support of the Community Relations Plan

- A. The Group did not undertake any activities during this reporting period in support of the Community Relations Plan. Group and City representatives corresponded with residents potentially affected by the planned City Well Restriction Ordinance.

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We trust that this submittal satisfies your requirements at this time. If you have questions regarding this monthly progress report or related project matters, please do not hesitate to contact me.

Respectfully submitted,



Leo M. Brausch
Project Coordinator

LMB:

cc: Deborah D. Larsen, MDEQ
Charles W. Graff, MDEQ

cc (via email):

NBIA Operable Unit 1 PRP Group Legal Committee
NBIA Operable Unit 1 PRP Group Technical Committee